

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA *ex rel.* AMY  
BERGMAN, *et al.*,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

Civil Action No. 09-4264 (CDJ)

**DECLARATION OF JONATHAN R. LAHN IN OPPOSITION TO RELATOR'S  
MOTION TO COMPEL ANSWERS TO RELATORS' FIRST AND SECOND SET OF  
REQUESTS FOR PRODUCTION TO DEFENDANT ABBOTT LABORATORIES**

I, Jonathan R. Lahn, declare upon personal knowledge and under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney with Kirkland & Ellis LLP, counsel for Defendant Abbott Laboratories, the Defendant in this matter. I make this declaration in support of Abbott's Opposition to Relator's Motion to Compel Answers to Relator's First and Second Sets of Requests for Production to Defendant Abbott Laboratories.

2. The following exhibits, attached to this declaration in support of Abbott's Opposition to Relator's Motion to Compel Answers to Relator's First and Second Set of Requests for Production to Defendant Abbott Laboratories, are true and correct copies of what they are described to be:

Exhibit No.	Description
1	Letter from Jonathan Lahn to Robert Nicholson, dated September 29, 2014

Exhibit No.	Description
2	Email from Jonathan Lahn to Gerald Herrmann, dated March 18, 2015
3	Letter from Jonathan Lahn to Gerald Herrmann, dated March 23, 2015
4	Email from Gerald Herrmann to Jonathan Lahn, dated April 3, 2015
5	Email from Jonathan Lahn to Gerald Herrmann, dated April 13, 2015
6	Letter from Jonathan Lahn to Robert Nicholson, dated May 21, 2015
7	Email from Robert Nicholson to Jonathan Lahn, dated June 4, 2015
8	Email from Robert Nicholson to Jonathan Lahn, dated June 23, 2015

3. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2015

By: /s/ Jonathan R. Lahn

Jonathan Lahn\*  
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*Counsel for Defendant Abbott Laboratories*

*\*admitted Pro Hac Vice*